

UNITED STATES OF AMERICA,)
)
 Plaintiff)
)
 v.)
 SHANICQUA LATRICE COLEMAN,)
)
 Defendant)

DEFENDANT'S OPPOSITION TO UNITED STATES' MOTION REGARDING JURY
COMPOSITION

Comes now your defendant, Shaniqua Coleman, and respectfully moves this Court for entry of an Order denying the United States' Motion Regarding Jury Composition. Your defendant states the following in support thereof:

1. Shaniqua Coleman hereby adopts the Motion filed by defendant Dashawn L. Trent [ECF420], its analysis, reliance on the sound discretion of the Court, and proper presentation of centuries of Anglo-American law and tradition. It is both legally and practically directly on point.

2. In regard to Shaniqua Coleman in particular, she is not charged with the RICO gang related charges, but suffers from the specific community problems such activity presents to those who live there. She must live with, maneuver around, and placate those who may be involved in drugs, violence and gang activity within a particular, substantially of African-American, local culture. People of unblemished record and with no involvement in such activity, who live in her community, understand what she faces and with whom she is friendly – sometimes by good neighbor oriented choice, and sometimes because she cannot avoid them. A

jury pool with at most, nine percent (9%) African-Americans, let alone with none having such a "Danville" housing experience, will not be of her peers, nor have any understanding of what she faces.

WHEREFORE, your defendant, by counsel, respectfully moves this Court for entry of an Order denying the United States' Motion Regarding Jury Composition, and, instead draw the venire in this case from the Danville Division.

Respectfully submitted

SHANICQUA COLEMAN

/s/ Richard L. Derrico

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was electronically filed with the Clerk of the Circuit Court using the CM/ECF system, and that a true and accurate copy of the foregoing was sent via the CM/ECF system to all counsel of record, on the 17th day of April, 2019.

/s/ Richard L. Derrico